## REMARKS

Upon entry of this Response, claims 1-19 remain pending in the present patent application. Claims 1, 2, 11, 12, 15, and 16 have been amended herein. Applicant respectfully requests reconsideration of the pending claims in view of the following remarks.

In item 4 of the Office Action, the disclosure is objected to for several reasons. First, it is alleged that on page 8, line 18 it is not clear as to which Figure is referred to in discussing the "content 176" as content 176 is employed in both FIGS. 3 and 4. However, it is noted that the actual content 176 is embodied in both the source document 129 of FIG. 3 and the output document 133 of FIG. 4. The transformation that takes place as discussed in the specification reformats the source document 129 into the output document 133. Thus, the content 176 is the same in both documents, it is simply reformatted as desired. Consequently, Applicant respectfully asserts that the reference to content 176 in both FIG. 3 and FIG. 4 is appropriate. In addition, a number of other typographical errors have been noted. Appropriate amendments to the specification are made herein to address the errors noted. Accordingly, Applicant respectfully requests that the objection of the specification be withdrawn.

Next, in item 6 of the Office Action, claims 1-19 have been rejected under 35 U.S.C. §102(e) as being anticipated by US Published Patent Application US 2002/0194220 filed by Sluiman (hereafter "Sluiman"). Anticipation under §102 "requires the disclosure in a single prior art reference of each element of the claim under construction." W.L. Gore & Associates, Inc. v. Garlock, Inc., 220 USPQ 303, 313 (Fed. Cir. 1983). Applicant asserts that Sluiman fails to show or suggest each of the elements of claims 1-19 in view of amendments made to selected ones of such claims. Accordingly, Applicant requests that the rejection of claims 1-19 be withdrawn.

To being, claim 1 has been amended so as to recite:

> 1.    A transformation method, comprising:
> providing a transformation processor;
> providing a prototype transform and an interpretive
> transform; and
> transforming at least one source document into an output
> document with the transformation processor by interpreting, using the
> transformation processor, a number of interpreted instructions in the

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prototype transform using a number of interpretive instructions from the interpretive transform.

Applicant asserts that Sluiman fails to show or suggest the elements of claim 1 as amended. Specifically, claim 1 has been amended to indicate that, using the transformation processor, a number of interpreted instructions in the prototype transform are interpreted using a number of interpretive instructions from the interpretive transform.

Sluiman discusses a system for reconciling complex data models. In this respect, Sluiman includes a fundamental data extractor 20 (FIG. 1) that is employed to extract "fundamental data" from two or more complex data models (CDMs). The fundamental data from each CDM includes aspects of the CDMs that are to be differenced and merged during a reconciliation process by a user. In this respect, the two or more CDMs may be different versions of the same model that need to be reconciled. For example, a later version may have experienced various updates, *etc.*, over and above an earlier version. The fundamental data extractor 20 applies a transform F1 to each of the CDMs to extract a fundamental data from each of the CDMs.

Once a fundamental data has been extracted from each of the CDMs, a user performs various functions to reconcile the fundamental data from each of the CDMs. Based upon reconciliation instructions from a user, a reconciliation engine 40 interprets the instructions to generate a single reconciled fundamental data set. Thereafter, the reconciled fundamental data set is applied to a fundamental data expander 50 that expands the reconciled fundamental data set into its full CDM equivalent. To perform the expansion of the reconciled fundamental data set, the fundamental data expander 50 applies a second transform F2 to the reconciled fundamental data set.

Thus, Sluiman discusses the use of a fundamental data extractor 20 that employs a first transform F1 to extract fundamental data from CDMs, and the use of a fundamental data expander 50 that employs a second transform F2 to expand reconciled fundamental data into an equivalent CDM. The transforms F1 and F2 are employed separately by the extractor or the expander to process their respective data sets. In other words, the instructions of a first one of the transforms F1 and F2 are not employed to interpret the instructions from a second one of the transforms.

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Claim 1 specifies both a prototype transform and an interpretive transform. Claim 1 also specifies that at least one source document is transformed into an output document with the transformation processor by interpreting, using the transformation processor, the interpreted instructions in the prototype transform using the interpretive instructions from the interpretive transform. Thus, the interpretive instructions of the interpretive transform are employed to interpret instructions in the prototype transform. This is simply not shown or suggested by Sluiman. In view of the foregoing discussion, Applicant asserts that Sluiman fails to show or suggest each of the elements of claim 1.

Accordingly, Applicant requests that the rejection of claim 1 be withdrawn. In addition, Applicant requests that the rejection of claims 10, 14, and 18 be withdrawn for the reasons discussed above with reference to claim 1. Also, Applicant requests that the rejection of claims 2-9, 11-13, 15-17, and 19 be withdrawn as depending from claims 1, 10, 14, or 18, respectively,

In addition, claim 2 has been amended to recite as follows:

> 2.      The method of claim 1, wherein the step of transforming the at least one source document into the output document with the transformation processor by interpreting the interpreted instructions in the prototype transform with the interpretive instructions from the interpretive transform further comprises processing a number of transformation specific instructions in the prototype transform, where the interpretive instructions are transformation generic with respect to the transformation of the at least one source document into the output document, and the transformation specific instructions are specific with respect to the transformation of the at least one source document into the output document.

Applicant asserts that Sluiman fails to show or suggest the elements of claim 2. Specifically, claim 2 specifies that the transformation specific instructions of the prototype transform are specific with respect to the transformation of the at least one source document into the output document. This reflects the fact that the transformation specific instructions will only perform a single type of transformation and cannot be applied to multiple different source documents. Also, claim 2 specifies that the interpretive instructions are transformation generic with respect to the transformation of the at least one source document into the output document. This reflects the fact that the interpretive transform may be applied to a number of different prototype transforms. The transformations of Sluiman are each performed with a single transform (F1 or F2). There is no delineation in Sluiman between

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transformation specific instructions and transformation generic instructions as applied to a single transformation as set forth in claim 2.

Accordingly, Applicant requests that the rejection of claim 2 be withdrawn for these additional reasons. Also, Applicant requests that the rejection of claims 11, 12, and 16 be withdrawn to the extent that the additional reasons discussed with reference to claim 2 are applicable to claims 11, 12, and 16.

In addition, claim 3 provides as follows:

> 3.     The method of claim 1, further comprising drawing an association among the prototype transform, the interpretive transform, and the at least one source document.

With respect to claim 3, the Office Action states:

> "Sluiman further discloses wherein comprising drawing an association (link) among the prototype transform, the interpretive transform, and the at least one source (input) document (E.g. see FIG. 1; page 3 [0036], is capable of displaying non-divergent fundamental data...the semantic view has an input for receiving fundamental data sets from link and an output...the generated semantic domain representation is usually graphically based)."

Claim 3 specifies that an association is drawn between the prototype **transform**, the interpretive **transform**, and the at least one source document. There is no such association drawn between multiple transforms and a source document in Sluiman. The data sets of Sluiman identified by the Office Action are not transforms as claimed. Also, given that the transforms F1 and F2 of Sluiman are applied in separate transformations, how is it that an association is drawn between them and the source document?

Accordingly, Applicant requests that the rejection of claim 3 be withdrawn for these additional reasons. Also, Applicant requests that the rejection of claims 13, 17 and 19 be withdrawn to the extent that the additional reasons discussed with reference to claim 3 are applicable to claims 13, 17 and 19.
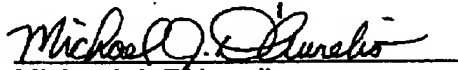
## CONCLUSION

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted,

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